

RE: WT Docket No. 05-235 – Pro

The majority of the NPRM deals with the removal of Element 1 (the 'code') as a requirement for Amateur Radio Service General and Extra Class licensing. In 1999, the FCC examined the rationale for code requirements and determined that a high proficiency in telegraphy did not produce better 'Hams'. I am certain that an analysis of Enforcement Bureau actions would show that those passing the 20 wpm constituted some of the worst offenders. (Many thanks to Riley Hollingsworth for his efforts to clean up the spectrum allocated to the Amateur Radio Service.)

While many arguments have been presented supporting the ability of Morse Code to be sent and received under extreme adverse conditions, voice modes have proven to be the usual means of communication during emergency and public service conditions. Maritime emergencies handled by the Maritime Mobile Service Net and the operations from Andaman and Nicobar Islands (VU4RBI/VU4NRO) following the 26 December 2004 tsunami demonstrate the extensive use of voice during crisis.

The elimination of the code requirement will not eliminate it from the amateur bands anymore than the lack of testing for Slow Scan TV has kept that mode from the airwaves. The biggest impediment to the expansion of Amateur Radio lies mostly with the attitude of the currently licensed operators and the perception of the Amateur Radio Service by the general public.

I applaud the slow but determined change the Commission is bringing to 'Ham Radio'. New modes, techniques and technologies are being developed. I look forward to changes the Commission will make to the rules enabling the advancement of wireless communications.

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